

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RED TREE INVESTMENTS, LLC,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and
PDVSA PETRÓLEO, S.A.,

Defendants.

Docket No.: 1:19-cv-002519
(related to 1:19-cv-002523)

**DECLARATION OF
ROBIN MUIR IN SUPPORT
OF MOTION TO
WITHDRAW AS COUNSEL**

ROBIN L. MUIR, an attorney admitted to practice in this Court, hereby declares, under penalty of perjury, as follows:

1. I am currently a senior associate of Hogan Lovells US LLP. I respectfully submit this declaration in support of my motion to withdraw as counsel for defendants Petr6leos de Venezuela, S.A. and PDVSA Petr6leo, S.A. (together, “Defendants”) in the above-captioned action.

2. Local Civil Rule 1.4 provides:

An attorney who has appeared as attorney of record for a party may be relieved or displaced only by order of the Court and may not withdraw from a case without leave of the Court granted by order. Such an order may be granted only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement

3. I am moving to withdraw as counsel of record for Defendants because, effective March 26, 2021, I will no longer be affiliated with Hogan Lovells US LLP. I am not asserting a retaining or charging lien.

4. My withdrawal as counsel of record will not unduly prejudice Defendants or cause any delay in these proceedings because Dennis H. Tracey, III, Richard C. Lorenzo (pro hac vice), and Matthew Ducharme of Hogan Lovells US LLP will continue to represent Defendants.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 24, 2021

/s/ Robin L. Muir

Robin L. Muir

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